

Robert S. Payne, Bar No. 08629  
Lincoln Law Center, LLC  
921 West Center St.  
Orem, UT 84057  
Telephone: (801) 224-8282  
Facsimile: (800) 584-6826  
Attorney for Debtor

<b>IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF UTAH</b>	
<b>IN RE:</b>  <b>LINDA K. KOELBEL</b>  Debtor	Bankruptcy Case #07-23598 Chapter 13  Filed Electronically
<b>DEBTOR'S MOTION TO AMEND CONFIRMED PLAN AND DEEM PLAN COMPLETE</b>	

Linda Koelbel, Debtor herein, moves this Court to amend her current chapter 13 plan and deem her chapter 13 plan complete, and would show the court the following:

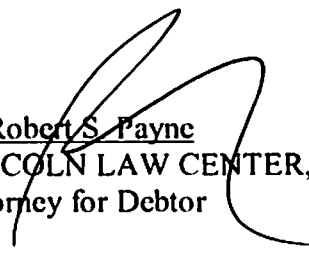
1. Debtor filed a voluntary petition for relief under chapter 13 of the Bankruptcy Code on August 6, 2007.
2. The plan was confirmed by order on December 5, 2007 for Debtor to pay \$81.80 per month as well as contribute her tax refunds for a minimum of three years.
3. Debtor has made her chapter 13 payments and turned over tax refunds since the plan was filed, unfortunately, her financial situation has worsened since filing the current chapter 13 bankruptcy.
4. She is currently unable to make the chapter 13 plan payment, although there is only \$655 in payments left to complete the plan (per a recent payoff request to the Chapter 13 Trustee).
5. Her employment hours have been cut over the past year to only 10 to 12 hours per week and she has been unable to secure additional employment. She is

currently receiving Community Action assistance to cover her monthly rental expenses.

6. Debtor requests that the Court amend her current plan to provide no additional payments to unsecured creditors and permit her to retain her 2009 tax refunds, if any.
7. Debtor further moves that this current plan be deemed complete so that she may file a Verification and Request for Discharge.

**WHEREFORE**, Debtor respectfully requests that this Court amend her Chapter 13 Plan to provide no additional payments from January 25<sup>th</sup> forward, to permit Debtor to retain her 2009 tax refunds, and to deem the plan complete.

DATED: This 2nd Day of March, 2010.

  
/s/ Robert S. Payne  
LINCOLN LAW CENTER, LLC  
Attorney for Debtor